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March 19, 2025

*Via ECF*

Honorable Thomas I. Vanaskie, Special Master  
Stevens & Lee, P.C.  
1500 Market Street, East Tower, 18th Floor  
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability  
Litigation*, No. 1:19-md-02875 (D.N.J.)

Dear Judge Vanaskie:

Please accept this letter on behalf of the Plaintiffs, providing a further update  
in response to ZHP's March 18, 2025 status update to the Court.

During the March 3, 2025 case management conference, the Court ordered  
ZHP to produce (1) all of its certificates of analysis (COAs) and material safety data  
sheets (MSDSs) for dimethylformamide, triethylamine, and triethylamine  
hydrochloride by March 17, 2025, (2) the document retention policy that ZHP  
alleges permitted it to destroy its COAs and MSDSs from before 2016, and (3) the  
"Chinese standard" it claimed applied to the contents of the COAs. (3/3/2025

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Hearing Tr. 47:7-12, 47:14-48:17, 50:20-21). The Court subsequently entered an Order on these issues. (ECF 2989).

On March 17, 2025, ZHP produced 755 documents as the full production of all COAs and MSDSs that ZHP has in its possession. Based on the review to date (Plaintiffs have not completed their review), Plaintiffs have determined the following:

First, ZHP produced additional COAs. However, none predate 2015. Moreover, the newly produced COAs contain significant information that was not found in any of the COAs previously produced by ZHP as part of the meet and confer in an effort to reach a stipulation on this issue. Specifically, dozens of the newly produced COAs for dimethylformamide show the actual presence of dimethylamine (described in the COAs as a positive result for “Alkalinity (calculated as dimethylamine).” During the months long meet and confer, the purported “representative” sample of dimethylformamide COAs produced by ZHP only included COAs with no dimethylamine disclosed as present. Given the dozens of COAs showing the presence of dimethylamine, with the earliest dated April 12, 2015, Plaintiffs have serious concerns about ZHP’s withholding of these important documents while asking Plaintiffs to believe that none existed actually disclosing the presence of dimethylamine – while negotiating a stipulation to resolve the issue.

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Second, no additional MSDSs were produced beyond the few produced previously in the “sample” provided to Plaintiffs during the parties’ meet and confer regarding the proposed stipulation. Plaintiffs expected additional MSDSs to be produced and question why none were produced.

ZHP has not produced the document retention policy it says allowed it to destroy COAs and MSDSs, and it has not produced the “Chinese standards” that ZHP says explain why their COAs are different from the publicly available ones located by Plaintiffs. To be clear, Plaintiffs need the “Chinese standards” for all three solvents for the relevant time period from January 1, 2010 to July 13, 2018.

ZHP should be ordered to complete its production of all outstanding documents by close of business tomorrow. Plaintiffs are willing to meet and confer with ZHP to the extent ZHP believes that it can provide helpful information to address the points set forth above. Once the productions are complete, Plaintiffs will then be able to fully evaluate whether and how to proceed.

Thank you for your courtesies and consideration.

Respectfully,



Adam M. Slater  
Plaintiffs’ Liaison Counsel

Cc: Counsel of record (via ECF)